

Via ECF

July 11, 2025

Honorable Lorna G. Schofield
United States District Court
Southern District of New York
40 Foley Square, Courtroom 1106
New York, NY 10007

Re: *The Travelers Indem. Co., et al v. Northrop Grumman Corp., et al.*,
Case No. 1:16-cv-08778-LGS [rel. 1:12-cv-3040-KBF]

Dear Judge Schofield:

Defendant Northrop Grumman (“NG”) and Intervenor Town of Oyster Bay (“Town”) jointly request that the Court extend by 45 days the deadline for NG to file a response to the Court’s June 10, 2025 Order (ECF 495), which concerns the Town’s motion to unseal. NG and the Town are pleased to report that they have reached an agreement in principle that, assuming it is finalized as anticipated, will obviate the need for the Town’s motion. The existing due date for NG’s response is July 15, 2025. NG and the Town jointly request an extension through August 29, 2025. NG and the Town also request an adjournment of the conference currently scheduled for August 5, 2025, to a date at the Court’s convenience after any necessary submission by NG. This is the second request for an extension of this deadline; NG previously sought an extension (ECF 498), which the Court granted (ECF 499).

In the June 10 Order, the Court granted the Town’s application to intervene for the purpose of pursuing a motion to unseal certain documents. The Court directed NG to file any objections to unsealing and/or proposed redactions regarding the documents at issue, taking into account “the Town’s interest in accessing the documents” and other factors. ECF 495.

As noted in NG’s prior submission, NG and the Town have been engaged in discussions in an attempt to resolve the dispute underlying the Town’s motion, including helping the Town identify requested documents to which it already has access. Those discussions have been productive. The parties have now reached an agreement in principle, but the process of finalizing that agreement is taking some time for a variety of reasons, including the intervening holiday, volume of documents, and giving the Town the time required to confirm that it already has or will receive the documents that are the subject of its motion to intervene.¹ At present, the parties anticipate finalizing this process within the next few weeks, and, assuming that happens, the Town anticipates it will withdraw its motion to unseal.

NG and the Town are hopeful that they can fully resolve the matter well before the requested extension deadline of August 29. Nonetheless, NG and the Town respectfully seek an extension through August 29 due to the uncertainties in the timeline for production and review of the documents, and in an effort to avoid further burdening this Court. Should the parties resolve the matter earlier than August 29, the parties will promptly advise the Court.

¹ The process of finalizing the agreement may also be delayed as a result of counsel unavailability during portions of July and August due to a scheduled trial and preexisting vacation plans.

For these reasons, NG and the Town jointly request that the deadline for NG to file any response to the Court's June 10 Order be extended through August 29, 2025, and they further request that the Court adjourn the scheduled conference until after any submission by NG.

Respectfully submitted,

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